

Thrift, Mike

From: Chang, Andy
Sent: Tuesday, February 23, 2016 4:24 AM
To: Jones, Rhea; Mathias, Scott
Cc: Thrift, Mike
Subject: Need input on responding to Associate Vice President of AECOM

Deliberative



Hi Rhea and Scott (and Mike, I know you're out till tomorrow)

(b) [REDACTED]
[REDACTED]
(5) [REDACTED]
)

- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

Andy Chang, M.S.
Environmental Engineer || U.S. EPA Office of Air Quality Planning & Standards
C545-A || 919-541-2416 (office)

From: Wallace, Larry
Sent: Monday, February 22, 2016 2:32 PM
To: Paine, Bob <bob.paine@aecom.com>
Cc: Chang, Andy <chang.andy@epa.gov>
Subject: RE: another question about resolution of SO2 NAAQS designations

Hi Bob. Andy is really the person who is working on designations for SO2.

Thanks,

Larry.

From: Paine, Bob [<mailto:bob.paine@aecom.com>]
Sent: Monday, February 22, 2016 1:26 PM
To: Wallace, Larry <Wallace.Larry@epa.gov>
Cc: Chang, Andy <chang.andy@epa.gov>
Subject: RE: another question about resolution of SO2 NAAQS designations

Larry (and Andy), I'm actually thinking about Consent Decree sources for which decisions are due by July 2, 2016. A decision for unclassifiable is possible for these sources, but in cases where the choice would be nonattainment, but it's a close call, this expedited resolution of an unclassifiable designation in the same time frame as a nonattainment designation is what I am thinking of.

The issues that this approach "solves", while not slipping in the ultimate schedule, are as follows:

- Some sources would benefit by having the opportunity to do 3 years of monitoring, an opportunity that was not provided with the rapid implementation of these rules in the past year.
- Some sources are just reducing emissions now, and those reductions are not well characterized by the requirement to go back 3 years into a period before the emissions reductions.
- The preferred air quality model, AERMOD, is in the midst of proposals to be revised, and some of the proposals can change the outcome. It would be better in some cases to provide a review after these changes are fully implemented.

Bob

From: Wallace, Larry [<mailto:Wallace.Larry@epa.gov>]
Sent: Monday, February 22, 2016 1:18 PM
To: Paine, Bob
Cc: Chang, Andy
Subject: RE: another question about resolution of SO2 NAAQS designations

Hi Bob. I think that the problem is that according to the DRR a state needs to make its decision concerning whether they will characterize affected sources by modeling or monitoring by July 1, 2016. So, that puts some constraints on what data will be used to do designations in the second round by December 2017 and December 2021.

Thanks,

Larry.

From: Paine, Bob [<mailto:bob.paine@aecom.com>]
Sent: Monday, February 22, 2016 1:08 PM
To: Wallace, Larry <Wallace.Larry@epa.gov>
Cc: Chang, Andy <chang.andy@epa.gov>
Subject: RE: another question about resolution of SO2 NAAQS designations

Thanks, Larry, for forwarding this question. I would propose a review in early 2020 for the 2017-2019 period using either modeling or monitoring, similar to what we are doing now. The benefits of a review then are:

- SO2 reductions just implemented or soon to be implemented will be able to be assessed over a 3-year period.
- The changes in the preferred model, which are now in a state of flux, would be settled.

The key requirement would be, for this type of agreement, that an expedited installation of controls, fuel change, or retirement, whatever the case may be, would be in place by September 2021.

Bob

From: Wallace, Larry [<mailto:Wallace.Larry@epa.gov>]
Sent: Monday, February 22, 2016 8:09 AM
To: Paine, Bob
Cc: Chang, Andy
Subject: RE: another question about resolution of SO2 NAAQS designations

Hi Bob. Thanks for your question below. I am copying Andy Chang who is handling designations for SO2 in another group within OAQPS. He is probably the best person to respond to your question. Andy, can you get back to Bob on his question below? Please let me know if I can help in any way.

Thanks,

Larry.

From: Paine, Bob [<mailto:bob.paine@aecom.com>]
Sent: Friday, February 19, 2016 1:29 PM
To: Wallace, Larry <Wallace.Larry@epa.gov>
Subject: another question about resolution of SO2 NAAQS designations

Larry, another question about the SO2 NAAQS designations has come up. This is especially pertinent for areas considered by the Consent Decree to be priority sources that need to be designated by July 2, 2016. With the time for publication in the Federal Register and a 60-day period for the rule to go into effect, it is likely that the effective date would be late September 2016. The 5-year period for any nonattainment areas to come into attainment would be late September 2021.

Some areas may have an uncertain designation because the modeling results to date are close to the NAAQS, or either above or below the NAAQS depending upon AERMOD model options chosen that are still being considered by OAQPS – rather unfortunate timing for how Appendix W changes are meshing with the SO2 NAAQS implementation. This makes nonattainment decisions based upon modeling which is in a state of flux a less-than-ideal solution.

I am wondering if a possible way to resolve the areas that are difficult to decide would be as follows:

- The area is determined to be unclassifiable subject to a 3-year period of monitoring from 2017-2019.
- The outcome of the monitoring would determine if the area is ultimately determined to be attainment or nonattainment.
- If nonattainment, the affected source(s) would agree to implement a federally-enforceable emission limit by late September 2021 – basically, in the same time period that would be in effect had the nonattainment designation been in place from 2016.

This is a way to have more certainty for the actual SO2 concentrations in areas where it is “too close to call”, while still adhering to the same 5-year schedule as if the area were classified as nonattainment.

Regards,

Bob Paine, CCM, QEP
Associate Vice President
Environment
D 978.905.2352
bob.paine@aecom.com

AECOM

250 Apollo Drive, Chelmsford, MA 01824
T 978.905.2100 F 978.905.2101
www.aecom.com